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***Counsel for Defendants SUNRISE HOSPITAL AND  
MEDICAL CENTER, LLC, and HCA HEALTHCARE, INC.***

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

AYNUR KABOTA, on behalf of herself and all  
other similarly situated individuals

Plaintiffs,

v.

SUNRISE HOSPITAL AND MEDICAL  
CENTER, LLC; HOSPITAL CORPORATION  
OF AMERICA, d/b/a HCA HEALTHCARE,  
INC.; and DOES 1 through 50, inclusive,

Defendants.

CASE NO. 2:25-cv-00684-MMD-DJA

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTEND DEADLINE  
FOR PLAINTIFF TO AMEND  
COLLECTIVE AND CLASS  
ACTION COMPLAINT AND TO  
EXTEND DEADLINE FOR  
DEFENDANTS TO ANSWER OR  
OTHERWISE RESPOND**

**(Third Request for Time)**

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Pursuant to Local Rules IA 6-1, 6-2 and 7-1, Defendant Sunrise Hospital and Medical Center, LLC (“Sunrise”) and HCA Healthcare, Inc.<sup>1</sup> (“HCA”) (collectively, “Defendants”) and Plaintiff Aynur Kabota (“Plaintiff”) (the “Parties”), by and through their counsel, hereby stipulate as follows:

1. Plaintiff filed her Complaint and Jury Demand on April 16, 2025. (ECF No. 1.)

2. On April 22, 2025, Plaintiff served a Notice of Lawsuit and Request for Waiver of Service on Defendants and on May 1, 2025, Defendants executed the Waiver of the Service of Summons, making the deadline to answer or otherwise respond to the Complaint June 23, 2025. (ECF Nos. 5, 6.)

3. On June 20, 2025, Defendants filed an Unopposed Motion for a 21-day Extension of Time to answer or otherwise respond to the Complaint. (ECF No. 7.)

4. On June 24, 2025, the Court granted the Unopposed Motion for Extension of Time, making the deadline for Defendants to answer or otherwise respond to the Complaint, July 14, 2025. (ECF No. 10.)

5. On July 14, 2025, the Parties stipulated to further extend the deadline for Defendants to answer or otherwise respond to the Complaint to September 12, 2025, so that they could continue good faith efforts to explore potential early resolution of this matter. (ECF No. 11.)

6. The Court granted the Parties’ Stipulation on July 15, 2025. (ECF No. 12.)

7. The Parties have continued their discussions in good faith, and, as part of those discussions, Plaintiff has determined that she will amend her Complaint as it relates to certain claims. To effectuate that, the Parties have agreed that Plaintiff will amend her Complaint on or before September 26, 2025, and Defendants may have 45 days from that date, until November 10, 2025, to allow the Parties to continue exploring potential resolution, or, in the alternative, for Defendants to answer or otherwise respond to Plaintiff’s amended Complaint.

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<sup>1</sup> HCA Healthcare, Inc. is improperly identified in the complaint as “Hospital Corporation of America d/b/a HCA Healthcare, Inc.” There is no such legal entity. Further, it is improperly identified as a defendant in this action. At all times, Sunrise was the proper employing entity of Plaintiff. HCA Healthcare, Inc. is a holding company which has no employees.

8. The Parties respectfully request that the Court (a) allow Plaintiff until September 26, 2025, to amend her Complaint; and (b) allow Defendants until November 10, 2025, to answer or otherwise respond to Plaintiff's amended Complaint.

9. This stipulation is made in good faith and not for any improper purpose or delay.

Based on the foregoing, IT IS HEREBY STIPULATED AND AGREED by and between the Parties through their respective counsel of record herein, and subject to Court order, that Plaintiff may amend her Complaint on or before **September 26, 2025**, and Defendants may answer or otherwise respond to Plaintiff's amended Complaint on or before **November 10, 2025**.

Respectfully submitted this 11<sup>th</sup> day of September 2025.

**THIERMAN BUCK**

**GREENBERG TRAURIG, LLP**

By: /s/ Leah L. Jones

By: /s/ Jason Hicks

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***Counsel for Plaintiff and all  
Similarly Situated Individuals***

***Counsel for Defendants Sunrise Hospital  
and Medical Center, LL, and HCA  
Healthcare, Inc.***

**IT IS SO ORDERED.**



DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 9/12/2025